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November 3, 2000

Ms. Toni Strother
USDA-AMS-TMP-NOP
P.O. Box 96456, Room 2510-S, Ag Stop 0268
Washington, D.C. 20090-6456

Dear Ms. Strother:

Our company, CH2O, International, is a leading provider of products and technology for growers and packers of organic produce in the Pacific Northwest. To this end, we have worked closely with the Washington State Organic Program in order to assist our customers primarily in the area of post-harvest processing of fruits and vegetables.

Organic produce growers and packers are faced with some unique problems:

- 1.) Shelf life is everything. All fresh produce is perishable. Spoilage means losses.
- 2.) Organic producers cannot apply the pesticides commonly used to control decay.
- 3.) Proper cleaning and sanitizing of organic produce removes spoilage organisms.
- 4.) Clean organic produce has better keeping quality, less decay and losses.
- 5.) Organic production is a business and clean produce gives a competitive advantage.

For the above reasons, we request the following modifications to the proposed National Organic Program in the areas of materials and post harvest practices:

Firstly, in the area of post-harvest processing, the simple term "water" needs clarification. There are at least two categories of water usage needing better definition in the Organic Program. Both the EPA in 40 CFR and the FDA in 21 CFR, in multiple locations, make the statement that a potable final rinse must follow contact with process water containing non-food compounds such as detergents, adjuvants, or sanitizers. We agree.

- 1.) Potable / Ingredient / Final Rinse – Must conform to EPA drinking water standards.
- 2.) Process Water– For washing, fluming, transporting, sanitizing produce.

Secondly, we request the use of the following FDA GRAS (Generally Recognized As Safe) direct food additives for use in process water when followed by a potable water rinse. These additives are for pH control in process water to assist in washing and cleaning and are not incorporated into the organic product. Additionally, all of the elements in the following compounds are found in, and are essential to, all living organisms.

- 1.) Sodium Hydroxide (NaOH) – for pH control in process water to assist cleaning.
- 2.) Potassium Hydroxide (KOH) – Ditto.
- 3.) Hydrochloric Acid (HCl) – Ditto.
- 4.) Phosphoric Acid (H3PO4) – Ditto.

Thirdly, we propose the approval of certain synthetic detergents for use in process water for washing organic produce when followed by a potable water rinse. Specifically, the proposed synthetic detergents must be listed in the US EPA List 4, inert ingredients of minimal concern. This list may be found at <http://www.epa.gov/opprd001/inerts/list4inerts.html>. These detergents, when used in process and wash water, assist in the removal of soil, debris, and spoilage organisms from the organic produce to enhance appearance and to increase shelf life. They are not incorporated into the produce as this is a post-harvest application and is followed by a potable water rinse.


Natural soap, currently approved for organic production, is absolutely useless under hard water conditions where it precipitates into soap scum. It also precipitates under conditions of low pH wash water used to remove calcium scale deposits on produce from high-hardness irrigation water.

Lastly, we request that chlorine and chlorine dioxide be retained at useful levels in process water for sanitizing organic produce when followed by a potable water rinse. At drinking water levels they totally ineffective as sanitizers. In fact, the usage of these compounds at potable levels does not even come close to minimum EPA and FDA requirements for sanitizing solutions.

Currently, Washington state allows the use of these sanitizer compounds at levels not to exceed 50 parts per million (determined as available chlorine) when followed by a potable water rinse. These levels are usually effective in most cases. We propose the National Program adopt these standards. What is most puzzling to many in the industry is why Peracetic acid at high and effective concentrations is currently allowed as an organic produce sanitizer when it is not even an EPA approved drinking water disinfectant at any level. While it is true that peracetic acid does not produce trihalomethanes and other disinfection byproducts in water, neither does chlorine dioxide.

Please do not hesitate to contact me for any further information.

Sincerely,



Scott P. Ager
Technical Services Manager
CH2O, International

Cc: Miles McEvoy, Washington State Organic Program